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April 25, 2025

VIA ECF

Hon. John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1320
New York, NY 10007

Re: *United States v. Dalpour*, Case No. 1:24-cr-00264-JPC

Dear Judge Cronan:

We write on behalf of both parties in the above-captioned matter and pursuant to the Court's Individual Rule 1.E. to respectfully request an extension of the April 29, 2025 deadline to submit a joint letter proposing a schedule for the filing of pretrial motions as well as an adjournment of the status conference currently scheduled for May 20, 2025. This is the parties' fifth request for an extension of time to submit a joint letter proposing a schedule for the filing of pretrial motions and the status conference in this matter; the Court granted the parties' first request on July 12, 2024 (ECF No. 35.), the second request on September 10, 2024 (ECF No. 41), the third request on November 11, 2024 (ECF No. 44), and fourth request on January 17, 2025 (ECF No. 51).

As previously disclosed to the Court, discovery remains ongoing in this matter. The defense received a production of a significant volume of material April 2, 2025, and it continues to make progress reviewing the government's prior productions. The materials defense counsel received from the government include materials seized from Mr. Dalpour's office, the contents of the mobile phone seized from Mr. Dalpour, and information regarding the monetary amounts that appear in the Indictment. Further review of the information produced by the government will require a considerable amount of time and will enable the defense to have an informed conversation with the government regarding potential pre-trial motions or a potential disposition of this matter short of trial.

For these reasons, the parties respectfully request (i) an adjournment – to June 30, 2025 – of the April 29, 2025 deadline to submit a joint letter proposing a schedule for the filing of pretrial motions in this matter, and (ii) a corresponding adjournment – to July 21, 2025 – of the status conference currently scheduled for May 20, 2025. The parties also agree to the exclusion of the

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time until a July 21, 2025, status conference under the Speedy Trial Act, as such an exclusion would serve the ends of justice. *See* 18 U.S.C. § 3161(h)(7)(A).

The parties have met and conferred regarding this joint request.

Respectfully submitted,

/s/ Jenny Kramer

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The request is granted. The deadline to submit a joint letter proposing a schedule for the filing of pretrial motions is adjourned to June 30, 2025. The status conference currently scheduled for May 20, 2025, is adjourned to July 21, 2025, at 9:00 a.m. The Court will exclude time until July 21, 2025, under the Speedy Trial Act to allow the defense to review discovery materials. The Court finds that the ends of justice served by that exclusion outweigh the best interest of the public and the Defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

SO ORDERED
April 28, 2025
New York, New York



JOHN P. CRONAN
United States District Judge